

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re the Ex Parte Application of FAIRLIGHT  
ART VENTURES LLP, for an Order to Take  
Discovery Pursuant to 28 U.S.C. § 1782.

NO. C18-1507JLR

~~[PROPOSED]~~ ORDER GRANTING  
PETITIONER'S APPLICATION FOR  
DISCOVERY PURSUANT TO 28 U.S.C. §  
1782

*QWR*

An Application having been made by Fairlight Art Ventures LLP ("Petitioner") to take discovery pursuant to 28 U.S.C. § 1782 from Richard C. Hedreen for potential use in a civil action commenced by Sotheby's United Kingdom against three defendants, including Petitioner, in the High Court of Justice, Business and Property Courts of England and Wales, Queen's Bench Division, Commercial Court (the "Application"); and

This Court having read the Application, the Declaration of James Atton executed on October 12, 2018, the Declaration of Stephen P. VanDerhoef executed on October 12, 2018 ("VanDerhoef Declaration") and exhibits thereto, and the proposed subpoenas *duces tecum* and *ad testificandum*; and it appearing to the Court that this Application meets the requirements of 28 U.S.C. § 1782 and the factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices, Inc.*, 542 U.S. 241, 249 (2004); it is hereby:

**Ordered**, that the Application is in all respects granted; and it is further

PROPOSED ORDER GRANTING PETITION TO TAKE  
DISCOVERY PURSUANT TO 28 U.S.C. SECTION  
1782 - 1

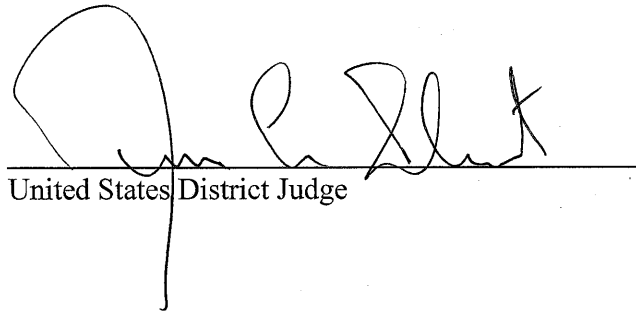
CAIRNCROSS & HEMPELMANN, P.S.  
ATTORNEYS AT LAW  
524 Second Avenue, Suite 500  
Seattle, Washington 98104-2323  
office 206 587 0700 fax 206 587 2308

1       **Ordered**, that Petitioner is authorized, pursuant to 28 U.S.C. § 1782 to seek discovery from  
2 Richard C. Hedreen pursuant to the Federal Rules of Civil Procedure by issuing and serving the  
3 subpoenas *duces tecum* and *ad testificandum* in substantially the form annexed to the Application  
4 as Exhibit D; and it is further

5       **Ordered**, that Richard C. Hedreen is directed to produce documents as set forth in the  
6 subpoenas within 15 days of the date of service of the subpoena *duces tecum* upon him, and to  
7 appear for the taking of his deposition testimony within 22 days of the date of service of the  
8 subpoena *ad testificandum* upon him, unless otherwise agreed by Mr. Hedreen and Petitioner; and  
9 it is further

10       **Ordered**, that if Richard C. Hedreen wishes to object to this Order or to the subpoenas  
11 issued hereunder or any parts thereof, an appropriate motion to quash or vacate this Order shall be  
12 served on Petitioner's attorneys within <sup>10</sup>~~five~~ days promptly after service of the subpoena on Richard  
13 C. Hedreen.

14  
15  
16       DATED this <sup>30</sup>~~30~~ day of October, 2018.

17  
18  
19         
20       United States District Judge  
21  
22  
23  
24  
25  
26

PROPOSED ORDER GRANTING PETITION TO TAKE  
DISCOVERY PURSUANT TO 28 U.S.C. SECTION 1782 - 2